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Proposed Counsel for
PAUL MANSDORF, Trustee in Bankruptcy

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

In re)	Case No.: 14-43089 RLE
)	Chapter 7
MUHAMMAD IMRAN,)	
)	APPLICATION FOR AUTHORITY TO
Debtor.)	EMPLOY COUNSEL (GORDON & REES
)	LLP)
)	
)	Date: (No Hearing Required)
)	Judge: Hon. Roger L. Efremsky

Paul Mansdorf, Trustee in Bankruptcy of the estate of the above-named Debtors
("Applicant" or "Trustee"), respectfully represents:

1. Applicant is the duly appointed, qualified and acting trustee in bankruptcy in this case.
2. Applicant desires to retain Gordon & Rees LLP ("Proposed Counsel"), as his counsel in connection with all matters related to the above-referenced Chapter 7 proceeding, including, but not limited to, the following:
 - a. Assist and advise the Trustee concerning investigation, collection and liquidation of potential assets of the estate;
 - b. Assist and advise the Trustee regarding any transfers which may be avoidable under the provisions of the Bankruptcy Code;
 - c. If the Trustee requests, assist the Trustee in the objection to claims; and

1 d. Attend Court hearings related to the foregoing.

2 3. Applicant believes that it is appropriate to retain counsel in this case for the
3 following reasons:

4 a. The Debtor made a transfer to her brother within one year before the filing of the
5 bankruptcy petition and assistance is needed to investigate the transfer, and if
6 appropriate, pursue the recovery of the transfer as a preference; and

7 b. The Debtor owns real property and, in the event there is equity, there will need to
8 be a motion filed for the sale of the real property and assistance relating to the
9 sale.

10 4. Applicant further desires to retain Proposed Counsel on the basis of its expertise
11 in bankruptcy law and believes that retention of counsel is necessary and would be in the best
12 interests of the estate.

13 5. Proposed Counsel is a limited liability law partnership. To the best of Applicant's
14 knowledge, Proposed Counsel has no connection with the debtor, creditors, or any other party in
15 interest, their respective attorneys and/or accountants, the United States Trustee or any person
16 employed in the Office of the United States Trustee, except as set forth in the declaration in
17 support of this application filed concurrently herewith ("Declaration"). Proposed Counsel does
18 not presently represent any interest adverse to the Trustee or to the estate, except as set forth in
19 the Declaration. Proposed Counsel is a disinterested person.

20 6. Proposed Counsel generally charges on an hourly rate basis. The current rates
21 charged by members of Proposed Counsel that are expected to render the majority of the services
22 to Applicant are as follows:

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Name	Hourly Rate
Sandi M. Colabianchi	\$425.00
Valerie L. Smith	\$400.00

24
25

26 In addition, hourly rates for other attorneys employed by Proposed Counsel range from
27 \$550 for an attorney to \$175 for a paralegal. Proposed Counsel's rates are subject to change
28 from time to time, but generally not more than once per year. The foregoing represents the

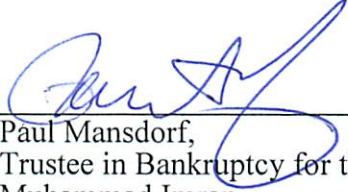
1 entirety of the agreement between Proposed Counsel and the Trustee; there is no further
2 agreement between the parties.

3 7. As a general rule, Proposed Counsel's billing practices are identical for
4 bankruptcy and non-bankruptcy clients. The hourly rates on which Proposed Counsel bases its
5 fees are generally the same for bankruptcy and non-bankruptcy clients but can be higher for non-
6 court-appointed representations.

7 8. Proposed Counsel is in compliance with the Bankruptcy Court's Guidelines for
8 Compensation and Expense Reimbursement of Professionals and Trustees. It does not charge for
9 its word processing and incoming telecopy costs. Additionally, Proposed Counsel charges \$0.20
10 per page for photocopying. In some instances, Proposed Counsel assesses a charge on some out-
11 of-pocket costs to reimburse it for administrative overhead expense, but Proposed Counsel does
12 not include such charges in bankruptcy fee applications.

13 WHEREFORE, Applicant prays for an Order authorizing the employment of Gordon &
14 Rees, LLP, as his counsel in this bankruptcy proceeding.

15
16 Dated: October 15, 2014



Paul Mansdorf,
Trustee in Bankruptcy for the Estate of
Muhammad Imran

17
18
19 Dated: October 15, 2014

GORDON & REES LLP

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21 By: /s/ Sandi M. Colabianchi
22 Sandi M. Colabianchi
23 Proposed Counsel to Paul Mansdorf,
24 Trustee in Bankruptcy
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